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**Pro hac vice*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
 PRISONERS et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL
 BUREAU OF PRISONS, et. al.,

Defendants.

Case No. 4:23-cv-04155-YGR

**JOINT STIPULATION AND
 [PROPOSED] ORDER REGARDING
 CASE SCHEDULE**

Pursuant to Fed. R. Civ. P. 6(b) and L.R. 6-1(b) and this Court’s May 24, 2024 Order (ECF No. 310), Plaintiffs and Defendants (collectively, the “Parties”), by and through their undersigned counsel of record, have conferred and hereby stipulate as follows:

WHEREAS, pursuant to this Court's Order (ECF No. 310) regarding the case schedule, the Parties agree to the following changes to the case schedule (all other dates remain unchanged):

Event	Current Date	Proposed New Date
INITIAL DISCLOSURES	June 21, 2024	
CASE MANAGEMENT CONFERENCE	September 9, 2024, at 2:00 p.m.	
SUBSTANTIAL COMPLETION OF DOCUMENT PRODUCTION	n/a	November 29, 2024
NON-EXPERT DISCOVERY CUTOFF:	October 31, 2024	December 13, 2024
DISCLOSURE OF EXPERT REPORTS: ALL EXPERTS, RETAINED AND NON-RETAINED, MUST PROVIDE WRITTEN REPORTS COMPLIANT WITH FRCP 26(A)(2)(B):	Opening: November 22, 2024 Rebuttal: December 20, 2024	Opening: January 6, 2025 Rebuttal: January 31, 2025
EXPERT DISCOVERY CUTOFF:	January 31, 2025	February 14, 2025
DISPOSITIVE MOTIONS/DAUBERT MOTIONS TO BE FILED BY:	February 28, 2025	
DISPOSITIVE MOTIONS/DAUBERT MOTIONS TO BE HEARD, IF FILED	Tuesday, April 8, 2025, at 2:00 p.m.	
COMPLIANCE DEADLINE	Friday, May 30, 2025, at 9:01 a.m.	
JOINT PRETRIAL CONFERENCE STATEMENT:	May 23, 2025	
PRETRIAL CONFERENCE:	Friday, June 6, 2025, at 9:30 a.m.	
TRIAL DATE:	Monday, June 23, 2025, at 8:00 a.m. for Jury Trial	

WHEREAS, the Parties agree that this stipulation, except for the above, does not and will not alter the date of any event or any deadline already fixed by Court Order;

NOW THEREFORE, the Parties hereby stipulate and agree to the requested changes in the case schedule as set forth above.

IT IS SO STIPULATED.

DATED: October 22, 2024

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER LLP
RIGHTS BEHIND BARS
ROSEN BIEN GALVAN & GRUNFELD LLP
CALIFORNIA COLLABORATIVE FOR IMMIGRANT
JUSTICE

By: /s/ Carson D. Anderson
Carson D. Anderson

Attorneys for Plaintiffs

DATED: October 22, 2024

Respectfully submitted,

JESSE A. LASLOVICH
United States Attorney

By: /s/ Abbie Cziok
Abbie Cziok

Assistant U.S. Attorney
Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to Civil L.R. 5-1(i), I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in this document's content and have authorized the filing of this document with the use of their electronic signature.

/s/ Carson D. Anderson